



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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NEW YORK, NY 10007

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December 29, 2020

**BY ECF**

Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED *Vern Bro*  
VERNON S. BRODERICK  
U.S.D.J. 12/30/2020

The parties are advised that further extensions  
are unlikely to be granted.

Re: Elgalad v. New York City Dept. of Educ. et al.  
Civil Action No. 17 Civ. 4849 (VSB)  
Law Dept. No.: 2017-036946

Dear Judge Broderick:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, attorney for Defendants in the above-referenced action. I submit this letter motion to request an extension of the close of discovery, from January 29, 2021 until March 31, 2021, for the sole purpose of taking Plaintiff's deposition and any requests for documents referenced at that deposition that have not been previously produced.

Document discovery in this matter is nearly complete. On December 18, 2020, this Court granted Plaintiff's former counsel's motion to withdraw from the case. Plaintiff is now *pro se*. Defendants noticed Plaintiff's deposition for January 7, 2021. Plaintiff has informed Defendants' counsel that he wishes to obtain representation prior to his deposition, and that he does not anticipate being able to do so by January 7<sup>th</sup>. Accordingly, Defendants seek an extension of discovery until March 31, 2021 for the sole purpose of taking Plaintiff's deposition and any subsequent document requests.

I thank the Court for its attention to this matter.

Respectfully Submitted,  
/s/  
Alana R. Mildner  
Assistant Corporation Counsel

cc: **By First-Class Mail and E-Mail**

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